

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:) Chapter 11
)
EASTERN LIVESTOCK CO., LLC,) Case No. 10-93904-BHL-11
)
Debtor.) Hon. Basil H. Lorch III

**SECOND INTERIM APPLICATION OF WIMBERLY LAWSON WRIGHT
DAVES & JONES, PLLC FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES
AS SPECIAL COUNSEL FOR JAMES A. KNAUER, CHAPTER 11 TRUSTEE**

James A. Knauer, the Chapter 11 trustee (the "Trustee") appointed in this case, files this second interim application (the "Application") on behalf of Wimberly Lawson Wright Daves & Jones, PLLC ("Wimberly Lawson") for the allowance and payment of Wimberly Lawson's fees as special counsel for the Trustee and for reimbursement of out-of-pocket expenses incurred on behalf of the Trustee. In support of Wimberly Lawson's Application, the Trustee states as follows:

1. Petitioning creditors commenced the above-captioned chapter 11 case (the "Chapter 11 Case") against Debtor on December 6, 2010 by filing an involuntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. This Court entered its *Order For Relief In An Involuntary Case And Order To Complete Filing* [Docket #110] on December 28, 2010.

2. On December 27, 2010, the Court entered its *Order Approving The Appointment Of James A. Knauer As Chapter 11 Trustee* [Docket #102], approving the United States Trustee's *Notice Of Appointment And Application for Order Approving Appointment of Trustee* [Docket #98] pursuant to 11 U.S.C. § 1104.

3. This Court, by order dated October 11, 2013 [Docket #2388], approved the Trustee's retention of Wimberly Lawson as the Trustee's special counsel.

4. This Application is the second interim application filed on behalf of Wimberly Lawson seeking compensation and reimbursement of out-of-pocket expenses incurred by the special counsel for the Trustee for the period April 9, 2014 through and including October 10, 2014. The work performed which is the subject of this application was reasonable and necessary to assist the Trustee's special counsel in pursuing judgment against Delbert Hawkins in Hamblen County Circuit Court.

5. As special counsel to the Trustee, Wimberly Lawson represents the Trustee in a collection suit in Circuit Court for Hamblen County, Tennessee, all as detailed in the time entries on attached Exhibit A.

6. Exhibit A provides the detail of the time entries for each Wimberly Lawson attorney or paralegal who has performed services in this case. A summary of the fees requested by Wimberly Lawson for each consultant and the number of hours worked for each individual, the billing rate requested and the total fees claimed is set forth below.

Attorney	Hours	Hourly Rate	Total
Mary Moffatt Helms	5.20	170/180	936.00

7. Wimberly Lawson has advanced the sum of \$85.11 for out-of-pocket expenses incurred in connection with this case on behalf of the Trustee during the period from April 9, 2014 through and including October 10, 2014. A summary of the out-of-pocket expenses incurred by Wimberly Lawson is set forth in Exhibit B.

8. All of Wimberly Lawson's time was related to this litigation matter.

9. This Application is the second application of Wimberly Lawson as special counsel for the Trustee in this case.

10. No agreement or understanding exists between Wimberly Lawson and any other person or entity for the sharing of compensation received for services rendered in connection with this case.

11. All services rendered and all expenses incurred for which compensation or reimbursement is sought have been rendered or incurred exclusively on behalf of the Trustee and represent necessary and proper legal services in the administration of this Chapter 11 Case.

WHEREFORE, Wimberly Lawson requests (i) the Court to award an allowance of compensation for special counsel fees in the amount of Nine Hundred Thirty Six Dollars and 00/100 (\$936.00) plus reimbursement for out-of-pocket expenses incurred in the amount of Eighty Five Dollars and 11/100 Dollars (\$85.11), and (ii) grant Wimberly Lawson all other just and proper relief.

Respectfully submitted,

KROGER, GARDIS & REGAS, LLP

By: /s/ James A. Knauer

James A. Knauer
111 Monument Circle, Suite 900
Indianapolis, IN 46204-5125
Telephone: 317-692-9000
Facsimile: 317-777-7451
jak@kgrlaw.com

*Chapter 11 Trustee on behalf of Special Counsel,
Wimberly Lawson Wright Daves & Jones, PLLC*

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2014, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

David L. Abt
davidabt@mwt.net

Amelia Martin Adams
aadams@dlgfirm.com

John W. Ames
james@bgdlegal.com

Kay Dee Baird kbaird@kdlegal.com	Christopher E. Baker cbaker@thbklaw.com	Robert A. Bell rabell@vorys.com
C. R. Bowles, Jr cbowles@ bgdlegal.com	David W. Brangers dbrangers@lawyer.com	Steven A. Brehm sbrehm@ bgdlegal.com
Kent A Britt kabritt@vorys.com	Kayla D. Britton kayla.britton@faegrebd.com	Joe Lee Brown Joe.Brown@Hardincounty.biz
Lisa Koch Bryant courtmail@fbhlaw.net	John R. Burns, III john.burns@faegrebd.com	John R. Carr, III jrciii@acs-law.com
Deborah Caruso dcaruso@daleeke.com	Ben T. Caughey ben.caughey@icemiller.com	Bret S. Clement bclement@acs-law.com
Joshua Elliott Clubb joshclubb@gmail.com	Jason W. Cottrell jwc@stuartlaw.com	Kirk Crutcher kcrutcher@mcs-law.com
Jack S. Dawson jdawson@millerdollarhide.com	Dustin R. DeNeal dustin.deneal@faegrebd.com	Laura Day Delcotto ldelcotto@dlgfirm.com
David Alan Domina dad@dominalaw.com	Daniel J. Donnellon ddonnellan@fclaw.com	Trevor L. Earl tearl@rwsvlaw.com
Shawna M. Eikenberry shawna.eikenberry@faegrebd.com	Jeffrey R. Erler jerler@ghjhlaw.com	William K. Flynn wkflynn@strausstroy.com
Robert Hughes Foree robertforee@bellsouth.net	Sandra D. Freeburger sfreeburger@dsf-atty.com	Melissa S. Giberson msgiberson@vorys.com
Thomas P. Glass tpglass@strausstroy.com	Patrick B. Griffin patrick.griffin@kutakrock.com	Terry E. Hall terry.hall@faegrebd.com
Paul M. Hoffman paul.hoffmann@stinsonleonard.com	John David Hoover jdhoover@hooverhull.com	John Huffaker john.huffaker@sprouselaw.com
Jeffrey L Hunter jeff.hunter@usdoj.gov	Jay Jaffe jay.jaffe@faegrebd.com	James Bryan Johnston bjtexas59@hotmail.com
Todd J. Johnston tjohnston@mcjllp.com	Jill Zengler Julian Jill.Julian@usdoj.gov	Jay P. Kennedy jpk@kgrlaw.com
Edward M King tking@fbtlaw.com	James A. Knauer jak@kgrlaw.com	Erick P. Knoblock eknoblock@daleeke.com
Theodore A. Konstantinopoulos ndohbky@jbandr.com	Randall D. LaTour rdlatour@vorys.com	David A. Laird david.laird@moyewhite.com
David L. LeBas dlebas@namanhowell.com	Martha R. Lehman mlehman@kdlegal.com	Scott R. Leisz sleisz@bgdlegal.com
Elliott D. Levin edl@rubin-levin.net	Kim Martin Lewis kim.lewis@dinslaw.com	James B. Lind jblind@vorys.com
Karen L. Lobring lobring@msn.com	Jason A. Lopp jlopp@wyattfirm.com	John Hunt Lovell john@lovell-law.net
Harmony A. Mappes harmony.mappes@faegrebd.com	John Frederick Massouh john.massouh@sprouselaw.com	Michael W. McClain mmcclain@mcclaindeweес.com
Kelly Greene McConnell lisahughes@givenspursley.com	James Edwin McGhee mcghee@derbycitylaw.com	Brian H. Meldrum bmeldrum@stites.com
William Robert Meyer, II rmeyer@stites.com	Kevin J. Mitchell kevin.mitchell@faegrebd.com	Terrill K. Moffett kendalcantrell@moffettlaw.com

Allen Morris amorris@stites.com	Judy Hamilton Morse judy.morse@crowedunlevy.com	Erin Casey Nave enave@taftlaw.com
Matthew Daniel Neumann mneumann@hhclaw.com	Walter Scott Newbern wsnewbern@msn.com	Shiv Ghuman O'Neill shiv.oneill@faegrebd.com
Matthew J. Ochs kim.maynes@moywhite.com	Jessica Lynn Olsheski jessica.olsheski@justice-law.net	Michael Wayne Oyler moyer@rwsvlaw.com
Ross A. Plourde ross.plourde@mcafeetaft.com	Brian Robert Pollock bpollock@stites.com	Wendy W. Ponader wendy.ponader@faegrebd.com
Timothy T. Pridmore tpridmore@mcjlp.com	Anthony G. Raluy traluy@fbhllaw.net	Eric C. Redman ksmith@redmanludwig.com
Eric W. Richardson ewrichardson@vorys.com	Joe T. Roberts jratty@windstream.net	David Cooper Robertson crobertson@stites.com
Mark A. Robinson mrobinson@vhrlaw.com	Jeremy S. Rogers Jeremy.Rogers@dinslaw.com	John M. Rogers johnr@rubin-levin.net
Joseph H. Rogers jrogers@millerdollarhide.com	James E. Rossow jim@rubin-levin.net	Steven Eric Runyan ser@kgrlaw.com
Niccole R. Sadowski nsadowski@thbklaw.com	Thomas C. Scherer tscherer@bgdlegal.com	Stephen E. Schilling seschilling@strausstroy.com
Ivana B. Shallcross ishallcross@bgdlegal.com	Sarah Elizabeth Sharp sarah.sharp@faegrebd.com	Suzanne M Shehan suzanne.shehan@kutakrock.com
James E. Smith, Jr. jsmith@smithakins.com	William E. Smith, III wsmith@k-glaw.com	Amanda Dalton Stafford ads@kgrlaw.com
Joshua N. Stine kabritt@vorys.com	Andrew D. Stosberg astosberg@lloydmc.com	Matthew R. Strzynski indyattorney@hotmail.com
Meredith R. Theisen mtheisen@daleeke.com	John M. Thompson john.thompson@crowedunlevy.com	Kevin M. Toner kevin.toner@faegrebd.com
Christopher M. Trapp ctrapp@rubin-levin.net	Chrisandrea L. Turner ctturner@stites.com	U.S. Trustee ustpregion10.in.ecf@usdoj.gov
Andrew James Vandiver avandiver@aswdlaw.com	Andrea L. Wasson andrea@wassonthornhill.com	Jennifer Watt jwatt@kgrlaw.com
Charles R. Wharton Charles.R.Wharton@usdoj.gov	Sean T. White swhite@hooverhull.com	Michael Benton Willey michael.willey@ag.tn.gov
Jason P. Wischmeyer jason@wischmeyerlaw.com	James T. Young james@rubin-levin.net	John D Dale, Jr. Johndaleatty@msn.com

I further certify that on October 29, 2014, a copy of the foregoing pleading was served via electronic mail transmission on the following:

Thomas Richard Alexander, II
tra@rgba-law.com

/s/ James A. Knauer